

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Alexandria Division

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
<b>v.</b>	:	<b>Criminal Case No. 1:18-CR-457 (AJT)</b>
	:	
<b>BIJAN RAFIEKIAN, et al.</b>	:	

**DEFENDANT BIJAN RAFIEKIAN'S MOTION  
TO COMPEL RECORDS**

Defendant Bijan Rafiekian, through counsel, respectfully moves the Court to compel the government to produce: (1) all information within the United States government's possession, including the State Department and the intelligence agencies, that indicates that Recep Tayyip Erdoğan ("Erdoğan") has ever been a member of, or otherwise affiliated with or sympathetic to, the Muslim Brotherhood, and (2) all information within the United States government's possession, including within the State Department, that tends to show that Turkish government officials, including Erdoğan, would disagree with or disapprove of any comparison between Fethullah Gülen or his followers and the Muslim Brotherhood. The grounds for this motion are set forth in the accompanying memorandum of law.

Defendant respectfully requests that the Court hear this motion on May 17, 2019, at 9:00 a.m., or at such time as the Court may direct.

Dated: April 26, 2019

Respectfully submitted,

/s/

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/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that, on the 26th day of April 2019, true and genuine copies of Defendant's Motion to Compel Records were sent via electronic mail by the Court's CM/ECF system to the following:

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/s/ \_\_\_\_\_  
Robert P. Trout (VA Bar # 13642)

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**[PROPOSED] ORDER**

Upon consideration of Defendant’s Motion to Compel Records, the memorandum in support thereof, any opposition thereto, any reply in further support thereof, and the entire record herein, for good cause shown, it is this \_\_\_\_ day of \_\_\_\_\_, 2019, hereby

**ORDERED** that the Motion is **GRANTED**; and it is further

**ORDERED** that the government shall produce to defendant (1) all information within the United States government’s possession, including the State Department and the intelligence agencies, that indicates that Recep Tayyip Erdoğan (“Erdoğan”) has ever been a member of, or otherwise affiliated with or sympathetic to, the Muslim Brotherhood, and (2) all information within the United States government’s possession, including within the State Department, that tends to show that Turkish government officials, including Erdoğan, would disagree with or disapprove of any comparison between Fethullah Gülen (“Gülen”) or his followers and the Muslim Brotherhood.

**SO ORDERED.**

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The Honorable Anthony J. Trenga  
United States District Judge